

# Alstom

## Ethics & Compliance

### E&C Ambassadors

December 2011



**ALSTOM**

# The Alstom Integrity Programme – 1/2

- Tone at the Top
  - ⇒ *“Ethical rules and values guarantee our future”*  
Patrick Kron, Chairman and CEO
- Independence and authority
  - ⇒ The SVP Ethics & Compliance reports to the Group General Counsel and has a direct access to the Chairman and CEO, to the Deputy CEO
  - ⇒ and to the Ethics, Compliance and Sustainability Committee of the Board.
- Adequate resources
  - ⇒ A dedicated E&C Department comprising 20 people, including 11 Compliance Officers,
  - ⇒ An E&C Ambassadors Community of 250 volunteers who diffuse the culture of integrity within the whole Group.

# The Alstom Integrity Programme – 2/2

- Content

- ⇒ Alstom Code of Ethics available in 21 languages
- ⇒ Group Instructions applicable to all employees
- ⇒ The Alstom Alert Procedure

- Implementation

- ⇒ E-Ethics e-learning module in 8 languages
- ⇒ Intense internal communication means: dedicated intranet section, posters, newsletters, ...
- ⇒ Ethics section on [www.alstom.com](http://www.alstom.com)

- Monitoring

- ⇒ Close collaboration with Internal Control and Audit
- ⇒ Certification by ETHIC Intelligence of the Alstom Integrity Programme.



# Objectives of the Alstom E&C Ambassadors Community

- Reinforce the resources of Ethics and Compliance
  - ⇒ Multiplying by more than 10 the E&C Resources
    - To support the implementation of the Alstom Integrity Programme
    - To develop the Alstom Integrity culture in a transversal manner in its ethical dimension (i.e. not responsible for Compliance)
- Initiative launched in May 2010 and supported by the Executive Committee:
  - Resources to help the E&C Ambassadors in their mission
  - Full support from the E&C Department, from the Group General Counsel, and from Alstom management.

# Alstom E&C Ambassadors Community Profile

- 250 E&C Ambassadors in 54 countries
- Coming mainly from the Legal, Finance and HR functions or being Country Presidents in charge of governance in their countries
- All motivated volunteers
  - Taking the role in addition to their responsibilities and committed to the cause
  - Close to the operations and to action and thus can be the 'eyes and the ears' for strengthening the ethical culture

# Alstom E&C Ambassadors Roles & Responsibilities – 1/2

- E&C Awareness
  - Take every opportunity in his/her business area or sphere of influence to make the Alstom Code of Ethics known (Articles in Newsletter, Slides in General Presentations, ....)
  - Be a relay for the Alstom Integrity Programme implementation
    - Help to disseminate the keys Ethics & Compliance messages
    - Promote the existing Group Instructions ⇒ Gifts & Hospitality, Political Contributions, Charitable Contributions, Sponsorship, Conflicts of Interest.
    - Encourage people to visit and use the Ethics section on the intranet
- E&C Culture development
  - Take initiatives to promote E&C : events, campaigns, ...
  - Encourage people to complete the existing E&C e-learning modules
  - Organise E&C Awareness sessions in his/her business area or sphere of influence

# Alstom E&C Ambassadors Roles & Responsibilities – 2/2

- E&C Detection and Prevention
  - Direct people towards the appropriate experts
  - Promote transparency and the Group Alert Procedure
  - Help people to behave ethically and take ethical decisions
  - Provide regular feedback to the E&C team on questions and concerns
- E&C Continuous Improvement
  - Propose and share initiatives that have succeeded
  - Be associated to new E&C projects

# Monitoring and support from the Alstom E&C Department

- Coordination through quarterly calls
- Providing standard presentations for E&C Awareness sessions
- E&C Ambassadors Community WIKI – web based sharing platform
- Monthly E&C Newsletter with real cases and ethical dilemmas
- Facilitation for preparing E&C Awareness sessions
- Support to help to answer to questions and issues raised
- Sharing E&C Ambassadors return of experience



# Alstom E&C Ambassadors – a few achievements after 18 months

- E&C Promotion
  - Publish articles in internal newsletters
  - Ask questions to E&C to provide feedback to the audience afterwards
  - Work with Legal and Sourcing to include an E&C clause in contracts
- E&C Awareness sessions ⇨ 65 sessions and more than 900 attendees
  - Translation of presentations or documents
  - Creation of the real cases scenarios and exercises for the audience
  - Use of the United Nations videos
- E&C Initiatives
  - Create a gift register.
  - Develop a handbook for meeting rooms, containing the main statements of Code of Ethics for relationships with suppliers
  - Use the label "E&C Ambassadors" in e-mails with a link to the E&C Newsletter

[www.alstom.com](http://www.alstom.com)

<http://www.alstom.com/ethics/>

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